

REMARKS

In the Office Action of February 27, 2007, the Examiner has required a substitute specification in proper idiomatic English and in compliance with 37 CFR 1.52(a) and (b).

- 5 In response, Applicants hereby note the substitute specification requirement and submit that a substitute specification will be filed in due course before payment of the issue fee, if necessary, pursuant to 37 CFR 1.125(b).

In addition, the Office Action has rejected claim 1 under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent Application No. 2002/0113882 A1 (“Pollard et al.”). Furthermore, claims 2-8 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Pollard et al. in view of U.S. Patent No. 7,023,913 (“Monroe”) and/or U.S. Patent No. 6,470,264 (“Bide”). In response, Applicants have amended the independent claim 1 to more clearly distinguish the claimed invention from the cited reference of Pollard et al. Claims 2-8 have also been amended. As amended, Applicants respectfully assert that the independent claim 1 is not anticipated by the cited reference of Pollard et al., as explained below. In view of the claim amendments and the following remarks, Applicants respectfully assert that the amended independent claim 1 and the dependent claims 2-8 are now in condition for allowance, and request that these pending 20 claims be allowed.

A. Patentability of Amended Independent Claim 1

As amended, the independent claim 1 recites the limitations of “*acquiring a first image of an object and a light source using a CCD sensor of a first photographing means, the first image including a first blooming streak along a first direction caused by the light source*” and “*acquiring a second image of the object and the light source using a CCD sensor of a second photographing means, the CCD sensor of the second photographing means being orientated in a different arrangement direction than the CCD sensor of the first photographing means, the second image including a second blooming streak along a second direction caused by the light source*.” These claim 30

limitations are not disclosed in the cited reference of Pollard et al. Thus, Applicants respectfully assert that the amended independent claim 1 is not anticipated by the cited references of Pollard et al., and request that this amended claim be allowed.

5 A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

10 As stated in the Abstract, the cited reference of Pollard et al. discloses a digital image capture apparatus that is arranged to capture at least two images of a document and combine the images to produce a final image in which the effects of specular reflection and/or ambient light are removed. In an embodiment, as illustrated in Fig. 1, the apparatus of Pollard et al. includes a single digital camera 101 having a light source 106 and a single detector 107. In another embodiment, as illustrated in Fig. 6, the apparatus of Pollard et al. includes a single digital camera having two light sources 606a and 606b and a single detector 607. Thus, in the apparatus of Pollard et al., images are captured using the same detector 107 or 607. Consequently, the cited reference of Pollard et al. does not disclose capturing different images using different detectors, e.g., different CCD 15 sensors.
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Since the cited reference of Pollard et al. discloses using only a single detector 107 or 607 to capture different images, the cited reference of Pollard et al. does not disclose *acquiring a first image of an object and a light source using a CCD sensor of a first photographing means, the first image including a first blooming streak along a first direction caused by the light source*” and “*acquiring a second image of the object and the light source using a CCD sensor of a second photographing means, the CCD sensor of the second photographing means being orientated in a different arrangement direction than the CCD sensor of the first photographing means, the second image including a second blooming streak along a second direction caused by the light source*” (emphasis added), as recited in the amended independent claim 1. Thus, the cited reference of
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Pollard et al. does not disclose each element recited in the amended independent claim 1. Consequently, the amended independent claim 1 is not anticipated by the cited reference of Pollard et al. As such, Applicants respectfully request that the amended independent claim 1 be allowed.

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B. Patentability of Dependent Claims 2-8

Each of the dependent claims 2-8 depends on the amended independent claim 1. As such, these dependent claims include all the limitations of the amended independent 10 claim 1. Therefore, Applicants submit that these dependent claims are allowable for at least the same reasons as the amended independent claim 1.

Applicants respectfully request reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

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Respectfully submitted,

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